

EXHIBIT 41

Redacted Excerpts of 30(b)(6)
Deposition of Ike Lawrence
Epstein on Fighter
Compensation

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

CUNG LE; NATHAN QUARRY, JON)	
FITCH, on behalf of)	
themselves and all others)	
similarly situated,)	
)	
Plaintiffs,)	
)	
vs.)	Case No.
)	2:15-cv-01045-RFB-(PAL)
)	
ZUFFA, LLC, d/b/a Ultimate)	
Fighting Championship and)	
UFC,)	
)	
Defendant.)	
_____)	

HIGHLY CONFIDENTIAL

VIDEOTAPED DEPOSITION OF IKE LAWRENCE EPSTEIN

LAS VEGAS, NEVADA

AUGUST 15, 2017

9:32 A.M.

REPORTED BY:
MICHELLE R. FERREYRA, CCR No. 876
JOB NO. 51651

78

79

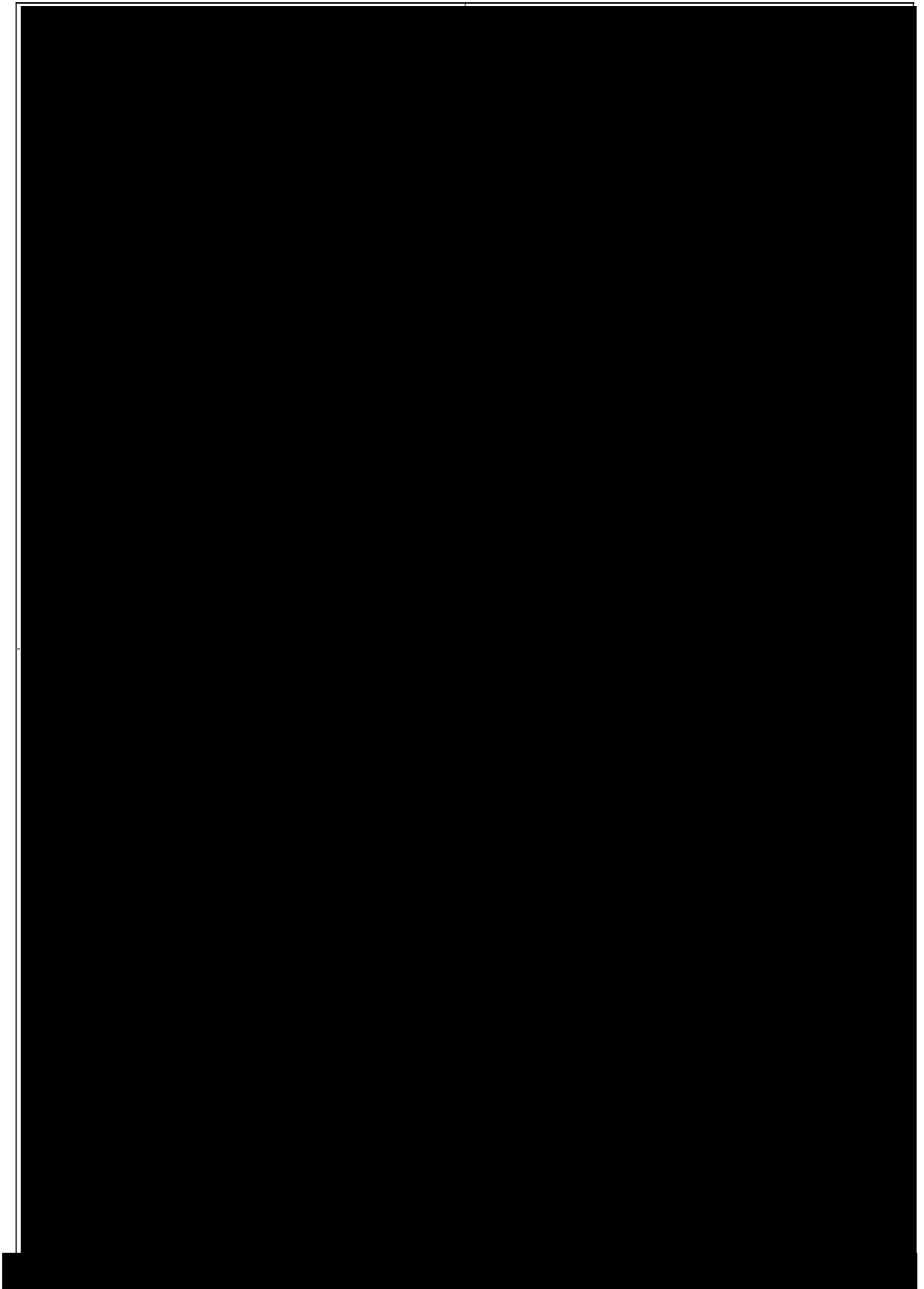
MR. WIDNELL: I just want to object quickly.

I don't believe -- or we do not believe that those are within the scope that the witness should have to be able to answer about the compensation of each and individual fighter after each and every individual fight.

You do have that information. We have provided it. I want to make clear that you can answer those questions simply by looking at the data that we have produced. But I -- I do want to make it clear that we don't think it's appropriate to -- or within the scope to expect the witness to be able to answer, you know, has this scenario ever happened and have that kind of encyclopedic knowledge about each and every individual fighter's compensation.

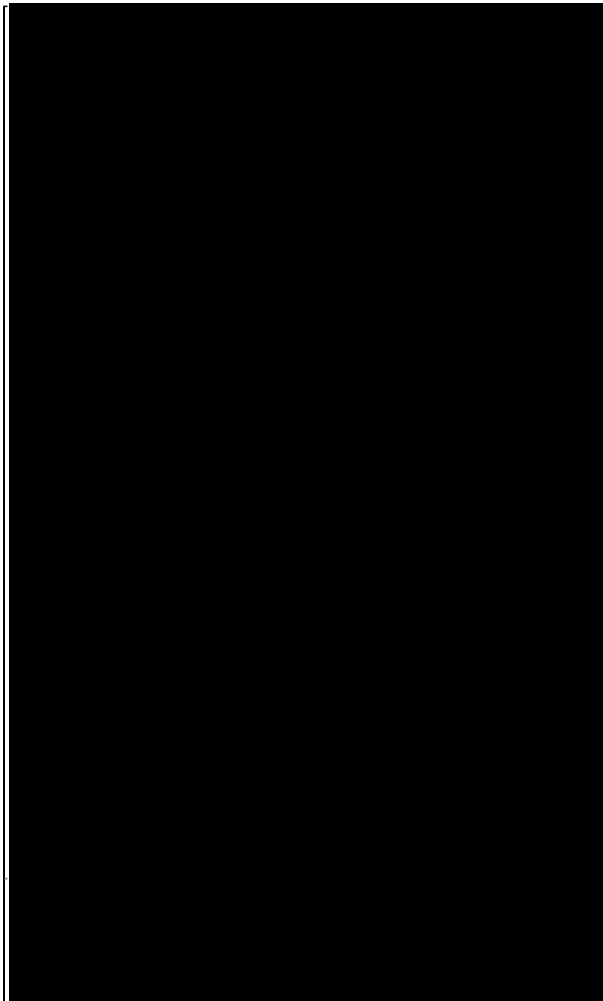
MR. RAYHILL: So, first of all, I haven't asked him about individual fighter's compensation.

21 (Pages 78 to 81)

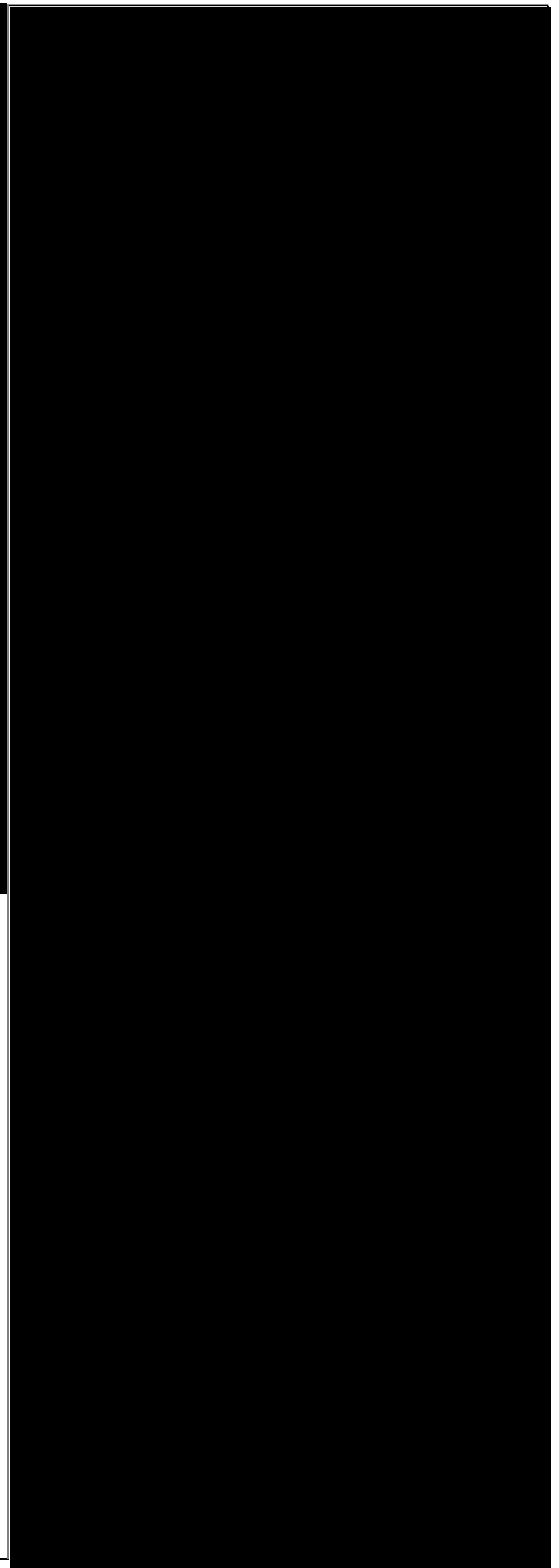


22 (Pages 82 to 85)

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3 **Q. Okay. I'm finished with that document.**
4 **Thank you.**
5 **(Exhibit 5 marked.)**
6 BY MR. RAYHILL:
7 **Q. You have been handed what's been marked as**
8 **Exhibit No. 5. It has the Bates No. ZFL-2602942. Let**
9 **me know when you've had a chance to look it over.**
10 A. All right. I have reviewed it.
11 **Q. Can you tell me what this document is?**
12 A. I don't recall ever seeing it before.
13 **Q. So I will represent that the document is an**
14 **e-mail at the bottom between Tara Connell and John**
15 **Mulkey. Can you tell me who Tara Connell is?**
16 A. Tara Connell was a woman who worked in our
17 finance team as a financial analyst.
18 **Q. Okay. And John Mulkey?**
19 A. Was our former CFO.
20 **Q. Very good. Thank you.**
21 **And then later on in the next e-mail and**
22 **subsequent series of e-mails, Mr. Mulkey forwards the**
23 **e-mail to Brent Richard. Do you know who Brent Richard**
24 **is?**
25 A. I do. Brent Richard was a -- I guess I would



23 (Pages 86 to 89)